

RAYMOND C. WINTER
PHONE: (512) 936-1709
Division Chief
FAX: (512) 370-9477
Civil Medicaid Fraud Division
EMAIL: Raymond.Winter@oag.texas.gov

January 13, 2022

Via ECF

Clerk of the United States District Court Northern District of Texas 205 SE 5th Avenue, Room 133 Amarillo, Texas 79101

Re: United States of America ex rel. Alex Doe, Relator, et al. v. Planned Parenthood Federation of America, Inc., et al.; Civil Action No. 2:21-cv-00022-Z; United States District Court for the Northern District of Texas, Amarillo Division.

Dear District Clerk:

Please issue the attached six summonses to Defendants Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc., in the above-referenced federal False Claims Act and Texas Medicaid Fraud Prevention Act case.

When completed, please return the summonses to my email listed above at your earliest convenience. The summonses and the State of Texas's Complaint in Intervention will be served on Defendants in accordance with the Order of the Court.

Thank you.

Sincerely,

/s/ Raymond C. Winter
Chief, Civil Medicaid Fraud Division
Office of the Attorney General of Texas

Encls.



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Thank you.

Sincerely,

/s/ Raymond C. Winter
Chief, Civil Medicaid Fraud Division
Office of the Attorney General of Texas

Encls.

for the

| United States of America, ex State of Texas, ex rel. Do Plaintiff v. Planned Parenthood Federa Planned Parenthood Gulf | tion of America, Inc., |))))) | Civil Action No. 2:21-cv-00022-Z | | | |
|--|------------------------|-----------|------------------------------------|--|--|--|
| | SUMMONS IN | A CI | VIL ACTION | | | |
| To: (Defendant's name and address) Planned Parenthood Cameron County, Inc. Polin C. Barraza 2140 Babcock Road San Antonio, Texas 78229 | | | | | | |
| A lawsuit has been filed | d against you. | | | | | |
| Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Raymond C. Winter Chief, Civil Medicaid Fraud Division Office of the Attorney General of Texas P.O. Box 12548, Capitol Station Austin, Texas 78711-2548 | | | | | | |
| If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court. | | | | | | |
| | | | CLERK OF COURT | | | |
| Date: | | | | | | |
| | | | Signature of Clerk or Deputy Clerk | | | |

Civil Action No. 2:21-cv-00022-Z

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (1))

| | This summons for (nan | ne of individual and title, if any) | | | | |
|--------|---------------------------|-------------------------------------|--|---------|----------|--|
| was re | ceived by me on (date) | | | | | |
| | ☐ I personally served | the summons on the individual | at (place) | | | |
| | | | on (date) | ; or | | |
| | ☐ I left the summons | at the individual's residence or | usual place of abode with (name) | | | |
| | | , a person | of suitable age and discretion who resid | des the | ere, | |
| | on (date) | , and mailed a copy to | the individual's last known address; or | • | | |
| | ☐ I served the summo | ons on (name of individual) | | | , who is | |
| | designated by law to a | accept service of process on beh | alf of (name of organization) | | | |
| | | | on (date) | ; or | | |
| | ☐ I returned the sumr | mons unexecuted because | | | ; or | |
| | ☐ Other (specify): | | | | | |
| | | | | | | |
| | | | | | | |
| | My fees are \$ | for travel and \$ | for services, for a total of \$ | | 0.00 | |
| | I de alema non den meneda | | - '- A | | | |
| | i deciare under penalty | y of perjury that this information | is true. | | | |
| Diti | | | | | | |
| Date: | | | Server's signature | | | |
| | | | | | | |
| | | | Printed name and title | | | |
| | | | | | | |
| | | | | | | |
| | | | Server's address | | | |

for the

| United States of America, ex rel. Doe, Relator, The State of Texas, ex rel. Doe, Relator, et al. |) | | | | | |
|--|---|--|--|--|--|--|
| Plaintiff |) | | | | | |
| V. |) Civil Action No. 2:21-cv-00022-Z | | | | | |
| Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc., et al. |) | | | | | |
| Defendant |) | | | | | |
| SUMMONS II | N A CIVIL ACTION | | | | | |
| To: (Defendant's name and address) Planned Parenthood Federation of America Office of the General Counsel 123 Williams Street New York, New York 10038 | | | | | | |
| A lawsuit has been filed against you. | | | | | | |
| are the United States or a United States agency, or an offi | ud Division eneral of Texas Station | | | | | |
| If you fail to respond, judgment by default will b You also must file your answer or motion with the court. | e entered against you for the relief demanded in the complaint. | | | | | |
| | CLERK OF COURT | | | | | |
| Date: | | | | | | |
| | Signature of Clerk or Deputy Clerk | | | | | |

Civil Action No. 2:21-cv-00022-Z

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| | This summons for (na | me of individual and title, if any) | | | |
|--------|------------------------|--|---------------------------------------|------------|--------|
| was re | ceived by me on (date) | · | | | |
| | ☐ I personally served | d the summons on the individual at | (place) | | |
| | | | on (date) | ; or | |
| | ☐ I left the summons | at the individual's residence or usu | nal place of abode with (name) | | |
| | | , a person of | suitable age and discretion who resid | des there, | |
| | on (date) | , and mailed a copy to the | e individual's last known address; or | • · | |
| | ☐ I served the summ | ons on (name of individual) | | , | who is |
| | designated by law to | accept service of process on behalf | of (name of organization) | | |
| | | | on (date) | ; or | |
| | ☐ I returned the sum | mons unexecuted because | | | ; or |
| | ☐ Other (specify): | | | | |
| | My fees are \$ | for travel and \$ | for services, for a total of \$ | 0.00 |) . |
| | I declare under penalt | ty of perjury that this information is | true. | | |
| Date: | | | | | |
| Date. | | | Server's signature | | |
| | | | Printed name and title | | |
| | | | | | |
| | | | Server's address | | |

for the

| United States of America, ex rel. Doe, Relator, The State of Texas, ex rel. Doe, Relator, et al. Plaintiff v. Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc., et al. Defendant |))) Civil Action No. 2:21-cv-00022-Z)) | | | | | |
|---|--|--|--|--|--|--|
| SUMMONS I | N A CIVIL ACTION | | | | | |
| To: (Defendant's name and address) Planned Parenthood of Greater Texas, Inc. Kenneth Lambrecht, Registered Agent 7424 Greenville Avenue, Suite 206 Dallas, Texas 75231 | | | | | | |
| are the United States or a United States agency, or an off P. 12 (a)(2) or (3) — you must serve on the plaintiff an a | eneral of Texas I Station | | | | | |
| If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court. | | | | | | |
| | CLERK OF COURT | | | | | |
| Date: | Signature of Clerk or Deputy Clerk | | | | | |
| | 2.g 3 of civil or 2 opini, civil | | | | | |

Civil Action No. 2:21-cv-00022-Z

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (1))

| | This summons for (na | me of individual and title, if any) | | | |
|--------|------------------------|--|---------------------------------------|------------|--------|
| was re | ceived by me on (date) | · | | | |
| | ☐ I personally served | d the summons on the individual at | (place) | | |
| | | | on (date) | ; or | |
| | ☐ I left the summons | at the individual's residence or usu | nal place of abode with (name) | | |
| | | , a person of | suitable age and discretion who resid | des there, | |
| | on (date) | , and mailed a copy to the | e individual's last known address; or | • · | |
| | ☐ I served the summ | ons on (name of individual) | | , | who is |
| | designated by law to | accept service of process on behalf | of (name of organization) | | |
| | | | on (date) | ; or | |
| | ☐ I returned the sum | mons unexecuted because | | | ; or |
| | ☐ Other (specify): | | | | |
| | My fees are \$ | for travel and \$ | for services, for a total of \$ | 0.00 |) . |
| | I declare under penalt | ty of perjury that this information is | true. | | |
| Date: | | | | | |
| Date. | | | Server's signature | | |
| | | | Printed name and title | | |
| | | | | | |
| | | | Server's address | | |

for the

| United States of America, ex rel. Doe, Relator, State of Texas, ex rel. Doe, Relator, et al. **Plaintiff** V. Planned Parenthood Federation of America, In Planned Parenthood Gulf Coast, Inc., et al. **Defendant** |))) Civil Action No. 2:21-cv-00022-Z |
|--|---|
| SUMM | ONS IN A CIVIL ACTION |
| To: (Defendant's name and address) Planned Parenthon, F Melaney Linton, F 4600 Gulf Freewa Houston, Texas 7 | Registered Agent |
| are the United States or a United States agency, or P. 12 (a)(2) or (3) — you must serve on the plaint the Federal Rules of Civil Procedure. The answer whose name and address are: Raymond C. Wint Chief, Civil Medic | aid Fraud Division ney General of Texas Capitol Station |
| If you fail to respond, judgment by defaul You also must file your answer or motion with the | It will be entered against you for the relief demanded in the complaint. e court. |
| | CLERK OF COURT |
| Date: | C: CCLL B. CLL |
| | Signature of Clerk or Deputy Clerk |

Civil Action No. 2:21-cv-00022-Z

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (1))

| | This summons for (na | me of individual and title, if any) | | | |
|--------|------------------------|--|---------------------------------------|------------|--------|
| was re | ceived by me on (date) | · | | | |
| | ☐ I personally served | d the summons on the individual at | (place) | | |
| | | | on (date) | ; or | |
| | ☐ I left the summons | at the individual's residence or usu | nal place of abode with (name) | | |
| | | , a person of | suitable age and discretion who resid | des there, | |
| | on (date) | , and mailed a copy to the | e individual's last known address; or | • · | |
| | ☐ I served the summ | ons on (name of individual) | | , | who is |
| | designated by law to | accept service of process on behalf | of (name of organization) | | |
| | | | on (date) | ; or | |
| | ☐ I returned the sum | mons unexecuted because | | | ; or |
| | ☐ Other (specify): | | | | |
| | My fees are \$ | for travel and \$ | for services, for a total of \$ | 0.00 |) . |
| | I declare under penalt | ty of perjury that this information is | true. | | |
| Date: | | | | | |
| Date. | | | Server's signature | | |
| | | | Printed name and title | | |
| | | | | | |
| | | | Server's address | | |

for the

| United States of America, ex rel. Doe, Relator, The |) |
|--|--|
| State of Texas, ex rel. Doe, Relator, et al. Plaintiff | ,) |
| |) Civil Asticu No. 2:24 ov 00022 7 |
| V. |) Civil Action No. 2:21-cv-00022-Z |
| Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc., et al. |) |
| Defendant |) |
| | |
| SUMMONS IN | A CIVIL ACTION |
| To: (Defendant's name and address) Planned Parenthood San A Jeffrey Hons, Registered A 2140 Babcock Road San Antonio, Texas 78229 | agent |
| are the United States or a United States agency, or an office | ou (not counting the day you received it) — or 60 days if you er or employee of the United States described in Fed. R. Civ. wer to the attached complaint or a motion under Rule 12 of |
| whose name and address are: Raymond C. Winter Chief, Civil Medicaid Frauc Office of the Attorney Gene P.O. Box 12548, Capitol S Austin, Texas 78711-2548 | I Division eral of Texas tation |
| If you fail to respond, judgment by default will be You also must file your answer or motion with the court. | entered against you for the relief demanded in the complaint. |
| | CLERK OF COURT |
| Date: | |
| | Signature of Clerk or Deputy Clerk |

Civil Action No. 2:21-cv-00022-Z

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| | This summons for (nam | ne of individual and title, if any) | | | |
|--------|-------------------------|-------------------------------------|---|------------|----------|
| was re | ceived by me on (date) | | | | |
| | ☐ I personally served | the summons on the individual at | (place) | | |
| | | | on (date) | ; or | |
| | ☐ I left the summons | at the individual's residence or us | aual place of abode with (name) | | |
| | | , a person of | f suitable age and discretion who resid | des there, | |
| | on (date) | , and mailed a copy to the | ne individual's last known address; or | | |
| | ☐ I served the summo | ons on (name of individual) | | | , who is |
| | designated by law to a | accept service of process on behal | f of (name of organization) | | |
| | | | on (date) | ; or | |
| | ☐ I returned the summ | nons unexecuted because | | | ; or |
| | ☐ Other (specify): | | | | |
| | | | | | |
| | My fees are \$ | for travel and \$ | for services, for a total of \$ | 0.0 | 00 . |
| | I declare under penalty | of perjury that this information i | s true. | | |
| | | | | | |
| Date: | | | Server's signature | | |
| | | | Printed name and title | | |
| | | | | | |
| | | | Server's address | | |

for the

| United States of America, ex rel. Doe, Relator, The State of Texas, ex rel. Doe, Relator, et al. |) |
|---|---|
| Plaintiff Plaintiff |) |
| v. | Civil Action No. 2:21-cv-00022-Z |
| Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc., et al. |) |
| Defendant |) |
| SUMMONS IN | A CIVIL ACTION |
| To: (Defendant's name and address) Planned Parenthood South Jeffrey Hons, Registered A 2140 Babcock Road San Antonio, Texas 78229 | Agent |
| A lawsuit has been filed against you. | |
| are the United States or a United States agency, or an offic | d Division eral of Texas itation |
| If you fail to respond, judgment by default will be You also must file your answer or motion with the court. | entered against you for the relief demanded in the complaint. |
| | CLERK OF COURT |
| Date: | |
| | Signature of Clerk or Deputy Clerk |

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|--------|---------------------------|-------------------------------------|--|---------|----------|--|
| was re | ceived by me on (date) | | | | | |
| | ☐ I personally served | the summons on the individual | at (place) | | | |
| | | | on (date) | ; or | | |
| | ☐ I left the summons | at the individual's residence or | usual place of abode with (name) | | | |
| | | , a person | of suitable age and discretion who resid | des the | ere, | |
| | on (date) | , and mailed a copy to | the individual's last known address; or | • | | |
| | ☐ I served the summo | ons on (name of individual) | | | , who is | |
| | designated by law to a | accept service of process on beh | alf of (name of organization) | | | |
| | | | on (date) | ; or | | |
| | ☐ I returned the sumr | mons unexecuted because | | | ; or | |
| | ☐ Other (specify): | | | | | |
| | | | | | | |
| | | | | | | |
| | My fees are \$ | for travel and \$ | for services, for a total of \$ | | 0.00 | |
| | I de alema non den meneda | | - '- A | | | |
| | i deciare under penalty | y of perjury that this information | is true. | | | |
| Diti | | | | | | |
| Date: | | | Server's signature | | | |
| | | | | | | |
| | | | Printed name and title | | | |
| | | | | | | |
| | | | | | | |
| | | | Server's address | | | |